

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU,
PERRY "PJ" MATLOCK,
JOHN RYBARCZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPERMAN,
MITCHELL HENNESSEY,
DANIEL KNIGHT.

No. 4:22-CR-00612-S

DEFENDANT'S MOTION FOR RETURN/DISBURSEMENT OF CASH BOND

TO THE HONORABLE ANDREW HANEN, UNITED STATES DISTRICT JUDGE:

COMES NOW STEFAN HRVATIN and submits this Motion for the return of the cash bond paid in the amount of twenty thousand dollars (\$20,000.00).

On March 20th, 2024, the Court dismissed the case without prejudice. As such, the cash bond should be released without delay. An executed and notarized Cash Bond Assignment is being filed contemporaneously with this Motion. We respectfully request that the cash bond be disbursed as delineated in the Assignment.

Respectfully submitted,

Carlos M. Fleites, P.A.
407 Lincoln Road
Suite 12E
Miami Beach, FL 33139
Tel: 305-672-8434
Fax: 786-228-4875
E-mail: cmfleites@mylawyr.com

By: /s/Carlos M. Fleites, Esq.
FBN: 370850

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion has been electronically filed and served upon all counsels of record on this the 27th day of March 2024.

/s/ Carlos M. Fleites

Carlos M. Fleites

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS (HOUSTON)

UNITED STATES OF AMERICA
Plaintiff,

CASE NO. 4:22-cr- 00612-5

v.

ASSIGNMENT OF BAIL BOND

STEFAN HRVATIN
Defendant.

I, STEPHANIE L. HRVATIN, Cash Bond ^{Depositor in} assignee is the above numbered and styled cause, do hereby assign, transfer and authorize my case bond refund in the amount of \$20,000 (twenty thousand dollars) plus accrued interest to be made payable to CARLOS M. FLEITES, P.A., whose mailing address is 407 Lincoln Road, Suite 12E, Miami Beach, FL 33139, upon final disposition of the above numbered and styled cause.

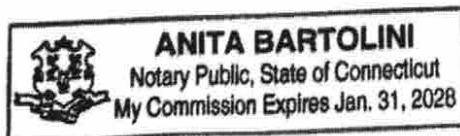
The undersigned Cash Bond Depositor understands that once this document is signed, all rights, claims, and interest of ownership are immediately transferred to the above assignee.

(The above assignee must complete an Internal Revenue Service Form W-9 or if the assignee is a nonresident alien individual, the assignee must complete a Form W-8, either of which may be obtained from the Clerk's Office Financial Section or Internet. The complete W-8 or W-9 form should be provided to the Financial Section, but not filed in the Court file. Upon final disposition of the above numbered and styled cause, a Motion for Disbursement of Bond, along with a signed copy of this form must be filed with the Court. A check will be mailed to the address indicated on the completed form, unless directed in writing otherwise.)

Stephanie L. Hrvatin
(Signature of Cash Bond Depositor)

3/23/23
(Date)

The foregoing instrument was acknowledged before me this 23 day of March, 2024. (Complete name as appeared. On original bond), who personally appeared before me and who is personally known to me or has produced CT Drivers License as identification.



Anita Bartolini
NOTARY PUBLIC STATE OF CT
Print Name: Anita Bartolini
My Commission Expires: Jan 31, 2028

Generated: Dec 15, 2022 10:56AM

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**U.S. District Court****Florida Southern - Miami**

STEPHANIE L. HRVATIN

Receipt Date: Dec 15, 2022 10:56AM

MIAMI, FL 33130

Rcpt. No: 261678

Trans. Date: Dec 15, 2022 10:56AM

Cashier ID: #VT

CD	Purpose	Case/Party/Defendant	Qty	Price	Amt
701	Treasury Registry	DFLS122MJ004106 FBO: Stefan Hrvatin	1	20000.00	20000.00

CD	Tender		Amt
CH	Check	#1201548887 12/14/2022	\$20,000.00
Total Due Prior to Payment:			\$20,000.00
Total Tendered:			\$20,000.00
Total Cash Received:			\$0.00
Cash Change Amount:			\$0.00

Comments: 22-mj-04106-AOR-1/Stefan Hrvatin REMITTER: STEPHANIE L. HRVATIN


MIAMI, FL 33130 BOND

Checks and drafts are accepted subject to collection and full credit will only be given when the check or draft has been accepted by the financial institution on which it was drawn.

Notice to Purchaser: In the event this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days.

VOID After 90 Days 30-1/1140 Date 12/18/22 04:30:12 PM NTX

BRICKELL 0001 0109384 0174


Pay  BANK OF AMERICA TWO ZERO ZERO ZERO ZERO DTSCTS

Twenty Thousand and 00/100 Dollars

To The Order Of U.S. COURTS

Remitter (Purchased By): STEPHANIE L HRVATIN

Bank of America, N.A.
SAN ANTONIO, TX


AUTHORIZED SIGNATURE

⑈ 1201548887⑈ ⑆ 114000019⑆ 001641001973⑈

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. ■ HOLD AT AN ANGLE TO VIEW WHEN CHECKING THE ENDORSEMENTS.